



SEALED

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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

YARO ORTIZ,

Defendant.

Case No. 2:20-mj-00859-EJY

APPLICATION TO SEAL

COMES NOW the United States of America, by and through Nicholas A. Trutanich, United States Attorney, and Christopher Lin Assistant United States Attorney, respectfully moves this Honorable Court for an Order sealing the Complaint, this Application and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

In this case, an order sealing the Complaint would be appropriate because the attached Complaint relates to an ongoing criminal investigation into violations of Title 18, United States Code, Section 1956(a)(3)(A) and (B), and Title 18, United States Code, Section 1960; that is neither public nor known to all of the targets of the investigation, and its disclosure may alert the targets to the ongoing investigation. Accordingly, there is reason to believe that the disclosure of the information

1 contained within the Complaint will jeopardize the investigation, including by giving additional
2 targets an opportunity to flee or continue flight from prosecution, destroy or tamper with evidence,
3 change patterns of behavior, or notify confederates.

4 The Government further submits that it is necessary for the Complaint to be sealed in light of
5 the fact that the Government anticipates filing other indictments, including controlled substance and
6 firearms charges, related to the underlying investigation with the goal of taking all defendants into
7 custody at one time. Accordingly, there is reason to believe that notification of the existence of
8 complaint will seriously jeopardize the investigation, as noted previously, and would likely place law
9 enforcement at higher risk of confrontation when securing the arrest of the targets.

10 DATED this 30th day of September, 2020.

11 Respectfully submitted,
12 NICHOLAS A. TRUTANICH
United States Attorney

13 /s/ Christopher Lin

14 Christopher Lin
15 Assistant United States Attorney
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

YARO ORTIZ,

Defendant.

Case No. 2:20-mj-00859-EJY

ORDER TO SEAL

Based on the pending Application of the Government, and good cause appearing therefor, **IT IS HEREBY ORDERED** that the Complaint, the Government's Application and this Court's Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 30th day of September, 2020.


HONORABLE ELAYNA J. YOUCHAH
UNITED STATES MAGISTRATE JUDGE